

Exhibit A

First Set Of Defendants' Requests For Production – Documents Plaintiffs Did Not Agree To Produce

Request for Production	Defendants' Request	Plaintiffs' Response
RFP No. 3	Any and all documents or communications concerning Your ownership of the Product, including but not limited to any and all documents or communications concerning where and when You owned the Product, to the extent not produced in response to Request Nos. and 2 above.	Agreed to produce responsive documents, subject to their objections to Request Nos. 8 and 11.
RFP No. 4	Any and all documents or communications concerning Your, Your agent's, or Your child's use of the Product.	Agreed to produce responsive documents, subject to their objections to Request Nos. 8 and 11.
RFP No. 8	Copies of all photographs or videos of Your child (and/or your children) in the Product.	Refused to produce.
RFP No. 11	Documents sufficient to show any and all equipment, furniture, devices (including but not limited to cribs, bassinets, cradles or Inclined Sleepers) You or Your Agent used for Your child' and/or your children's sleep from the child's or children's birth to one year of age.	Refused to produce.
RFP No. 15	Any and all documents referenced in Your complaint in this action.	Refused to produce.
RFP No. 18	Documents sufficient to identify all cases in which Your are serving and/or have served as a class representative or in which You are seeking and/or have sought to serve as a class representative.	Refused to produce.
RFP No. 19	Documents sufficient to identify all cases, other than this case, in which You have been represented by Your attorney in this action.	Refused to produce.